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To: [Coltrain, Katrina](#)
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Subject: Wilcox Oil - RI/FS phase breakdown
Date: Thursday, May 19, 2016 11:47:33 AM
Attachments: [Delineating Pb cleanup boundaries.docx](#)

Hi Katrina,

Based on our conference call with the technical team back on May 13th, our team believes the investigation should prioritize the RI/FS based on the highest potential exposure and migration pathways with the thoughts that these areas identified may be candidates for early action in the remedial process. Here's our suggestion for those areas with consideration to the early phases of this investigation:

Phase I Investigation

Rationale: The premise of the Phase I work was to address high priority exposure and migration threats to quickly move onto the next steps (mitigation and more detailed investigation for potential interim action).

- Indoor Air for current residents
- Surface Water-Groundwater Interaction at Loraine & Wilcox Refinery Areas
- Surface Soils delineation around the Sweeting Area (area with highest lead concentrations) in the Wilcox Refinery – see attached delineation approach methodology
- Abandon conduit wells (i.e. church well)
- Areas focused on COPC presence based on CSM (i.e. for dioxin, basing decision units around the distillation tanks, for PCB, transformer and heat transfer fluids areas, for TENORM/NORM, sedimentation ponds, equipment cleaning and scale removal areas. The SAP would need to focus in on the potential source area for each COPC and develop decision units for each COPC)
- Suspected individual sources – move to Phase II if funding is constrained
- Site Background Study – move to Phase II if funding is constrained

Investigation methods, an exposure-based decision units (and possible incremental composite sampling) would be most efficient investigation technique, whereas if migration is the greatest concern a broader innovative investigation technique (IR and PDBs in the stream) will be addressed in comments and submitted for discussion in our June 3rd meeting. Note that some of the AOCs may represent both exposure and migration (church well).

Phase II/Later Investigations

Rationale: Compete contaminant fate & transport site characterization for no unacceptable exposure for the land use and site cleanup goals

- Surface Water-Groundwater Interaction at Eastern & Northern Tank Farm Areas
- Soils (surface and vadose) at Eastern & North Tank Farm Areas
- Groundwater (shallow and possibly regional aquifer)
- Private/Monitoring Wells (unless COCs are present, then move to phase I)
- Waste Characterization

We plan to provide specific comments to SAP prior to our call on June 3rd. Let us know if you would like to discuss ahead our meeting.

Thanks,

Matt

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